

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION

RANDY J. SPENCER,
Plaintiff

V.

MATT MCSPARREN, BOB BETZOLD,
FRED BUCKHOLTZ, and REGINA
DELOE, ERIC HEIL, and TOWNSHIP
OF CRANBERRY
Defendants

Docket No. 1:23-cv-00036-SPB

Electronically Filed

JURY TRIAL DEMANDED

SECOND JOINT MOTION TO EXTEND CASE MANAGEMENT DEADLINES

NOW COMES the Plaintiff, Randy J. Spencer and Defendants Matt McSparren, Bob Betzold, Fred Buckholz, Regina Deloe, Township of Cranberry, and Eric Heil and file this Joint Motion to Extend Case Management Deadlines, respectfully representing:

1. On June 6, 2023, this Honorable Court entered an Initial Scheduling Order setting the close of discovery for October 10, 2023.
2. On September 22, 2023 Plaintiff and Defendants filed a Joint Motion for Extension of Time to Complete Early Neutral Evaluation and to Extend Case Management Deadlines.
3. On September 27, 2023 this Honorable Court entered a text Order granting that Motion and extending deadline the close of discovery for January 8, 2024.
4. Plaintiff and Defendant are requesting an additional sixty (60) days to complete discovery because further discovery is needed to substantiate claims and defenses asserted by the parties.

5. Plaintiff and Defendants agree to this Motion.
6. The parties do not anticipate the need for an additional extension of time to complete fact discovery.
7. The parties have attached a proposed Order.

WHEREFORE, Plaintiff and Defendants respectfully request this Honorable Court grant the requested extension to complete discovery and extend the current Case Management deadlines by sixty days.

Respectfully submitted,
Lavery Law

DATE: December 29, 2023

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DATE: December 29, 2023

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